

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JPMORGAN CHASE BANK,  
NATIONAL ASSOCIATION,

Plaintiff,

v.

JOHN W. HIGGINS,  
MARTHA R. HIGGINS; and the  
UNITED STATES OF AMERICA,

Defendant.

UNITED STATES OF AMERICA,

Counterclaim/Crossclaim Plaintiff,

v.

JOHN W. HIGGINS,  
MARTHA R. HIGGINS,

Crossclaim Defendants

And

JPMORGAN CHASE BANK, N.A., and  
TREASURER, BERRIEN CO., MICHIGAN

Counterclaim Defendants.

Case No. 1:23-cv-01112

Hon. District Judge Robert J. Jonker

**STIPULATION REGARDING DISMISSAL OF COUNTERCLAIM DEFENDANT**

**TREASURER OF BERRIEN COUNTY, MICHIGAN**

All parties in the above captioned case stipulate and agree as follows:

1. The United States, in its crossclaim and counterclaim, named the Treasurer of Berrien County, Michigan, as the local taxing authority, for her potential claim of interest in the property at issue in this case, located at 50102 Alpine Blvd., New Buffalo, MI 49117.

2. The United States, plaintiff JPMorgan Chase Bank, N.A., defendants John and Martha Higgins, and the Treasurer, now all agree that Treasurer of Berrien County, Michigan will not have an interest in this action and shall be dismissed.

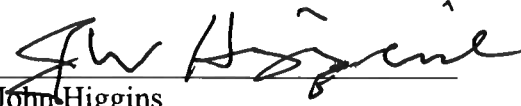
IT IS AGREED:

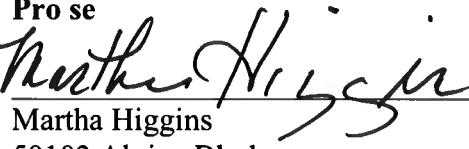
DAVID A. HUBBERT  
Deputy Assistant Attorney General

/s/ Sarah Stoner  
SARAH STONER  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 55  
Washington, D.C. 20044  
T: (202) 514-1170 / F: (202) 514-5238  
Sarah.Stoner@usdoj.gov  
**Counsel for United States**

/s/ Mark Magyar (with permission)  
MARK J. MAGYAR  
Dykema Gossett PLLC  
201 Townsend St., Suite 900  
Lansing, MI 49301  
(616) 776-7523  
mmagyar@dykema.com  
**Counsel for JPMorgan Chase Bank, N.A.**

/s/ Thaddeus Hackworth (with permission)  
THADDEUS J. HACKWORTH  
Corporate Counsel  
Berrien County - Administration  
701 Main St.  
St. Joseph, MI 49085  
(269) 983-7111 x8416  
thackworth@berriencounty.org  
**Counsel for Treasurer of Berrien County**

  
John Higgins  
50102 Alpine Blvd.  
Grand Beach, MI 49117  
(312) 560-9620  
jhiggins@higginsdevelopment.com

**Pro se**  
  
Martha Higgins  
50102 Alpine Blvd.  
Grand Beach, MI 49117  
(312) 560-9620  
jhiggins@higginsdevelopment.com  
**Pro se**

IT IS SO ORDERED.

Dated:

---

HON. ROBERT J. JONKER  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I certify that on February 5, 2024, I filed the foregoing document with the Court's CM/ECF system, which will cause electronic copies to be delivered to all counsel who have registered to receive such notices.

Additionally, I certify that shortly after filing the foregoing, I caused to be mailed a copy to the parties not registered with the Court's CM/ECF system:

John Higgins  
50102 Alpine Blvd.  
Grand Beach, MI 49117

Martha Higgins  
50102 Alpine Blvd.  
Grand Beach, MI 49117

/s/ Sarah Stoner  
SARAH STONER  
Trial Attorney, Tax Division  
U.S. Department of Justice